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MEMO ENDORSED ^{May 6, 2025}

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

*The adjournment is granted to do extend the
pretrial filings are now due on May 30, 2025,
with responsive papers due on June 6, 2025.*

SO ORDERED:

Paul G. Gardephe

Re: Haynes v. The City of New York, 19 Civ. 11008 ~~PGG (SV)~~ **Paul G. Gardephe, U.S.D.J.**

Dear District Judge Gardephe:

Dated: May 7, 2025

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants City of New York, David Hansell, Jill Krauss, Melissa Hester, and Tia Waddy in the above-referenced case. I write to respectfully request that the date for the parties to submit pretrial filings be adjourned from May 23, 2025 until June 6, 2025, and the date to file responsive papers be adjourned from May 30, 2025 until June 13, 2025. Plaintiff does not consent to this request, noting that "the compressed timeframe [Defendants] propose would significantly compromise [Plaintiff's] ability to prepare for the June 23 trial, especially in light of the fact that the court will need to rule well in advance of trial on motions *in limine* and pretrial submissions. Unless the Court is also amenable to adjusting the trial date, [Plaintiff] cannot consent to a pretrial schedule that undermines trial readiness." Additionally, Plaintiff's counsel notes that the proposed adjournment increases the risk that trial may extend beyond the currently scheduled dates into July. Plaintiff's counsel has long-standing, pre-scheduled business travel with overseas clients from July 16 to July 22, 2025, and respectfully requests that, should the trial be adjourned or extended, the Court consider this conflict in future scheduling.

The reason for Defendants' request is that, as noted in Defendants' April 10 motion to adjourn the trial, ECF No. 107, I will be traveling abroad on a previously-scheduled vacation from May 15 through May 23, and our trial team is currently engaged on a trial that commenced May 5 in the matter of Ringel v. DOE, No. 19-CV-2374 (TAM). Accordingly, Defendants would be very hard-pressed to submit pretrial filings on May 23. Moreover, the parties are continuing to negotiate towards a settlement, and they are scheduled to attend a settlement conference with Magistrate Judge Willis on May 29.

I thank the Court for its consideration herein.

Respectfully submitted,

/s/ Christopher G. Arko

Senior Counsel

Labor and Employment Law Division